

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN)
Plaintiff,) Cause No.
v.) Division No.
WAL-MART STORES EAST I, L.P.,) PERSONAL INJURY
d/b/a WAL-MART SUPERCENTER) PREMISES LIABILITY
STORE #1188) JURY TRIAL DEMANDED
Serve: Registered Agent)
CT Corporations System)
120 S. Central Ave.)
Clayton, MO 63105)
Defendant.)

PETITION

COMES NOW Plaintiff Merilynn Jordan by and for her claim and cause of action against Defendant states as follows:

1. At all times relevant herein, Defendant owned and/or was responsible for maintaining the Wal-Mart Supercenter located at 11900 St. Charles Rock Road, Bridgeton, Missouri 63044.
2. On or about February 16, 2016, Plaintiff was on Defendant's said premises as a customer and business invitee.
3. While on the premises, there were overlapping floor rugs in the entry way of the store and as a result the floor was not reasonably safe.
4. Defendant knew or by using ordinary care could have known of this condition.
5. Defendant failed to use ordinary care to remove, eliminate, barricade, or warn of this condition.

6. Such failure directly caused or directly contributed to cause Plaintiff to fall and sustain injuries and damages to her head and left hip, said injuries being permanent and to incur medical and other health care related expenses and Plaintiff will in the future incur additional expenses for further medical care and services.

WHEREFORE, Plaintiff Merilynn Jordan prays judgment against Defendant for such sums as are fair and reasonable in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) and for costs herein expended, and for such further and additional relief as warranted under the premises.

Respectfully submitted,

THE GERMEROTH LAW FIRM



THOMAS P. GERMEROTH, #47611
7710 Carondelet, Suite 215
Clayton, Missouri 63105
(314) 727-2100 Telephone
(314) 727-2700 Facsimile
tpg@germerothlaw.com

Attorney for Plaintiff

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN)
Plaintiff,) Cause No. 16SL-CC004312
v.) Division No. 2
WAL-MART STORES EAST I, L.P.,)
d/b/a WAL-MART SUPERCENTER)
STORE #1188)
Serve: Registered Agent)
CT Corporations System)
120 S. Central Ave.)
Clayton, MO 63105)
Defendant.)

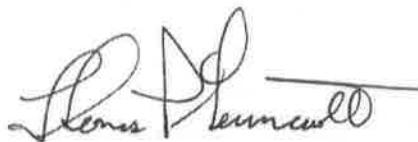
REQUEST FOR ISSUANCE OF SUMMONS

COME NOW Plaintiffs, by and through counsel, and request that the Court direct the Clerk to issue a Summons for service upon defendants:

Defendant: WAL-MART STORES EAST I, L.P., d/b/a WAL-MART SUPERCENTER STORE #1188

Serve: Registered Agent
 CT Corporation System
 120 South Central Avenue
 St. Louis, MO 63105

Respectfully submitted,



Thomas P. Germeroth, #47611
7710 Carondelet Ave., Suite 215
Clayton, Missouri 63105
(314) 727-2100 Telephone
(314)727-2700

tpg@germerothlaw.com



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

| | |
|---|---|
| Judge or Division: MAURA B MCSHANE | Case Number: 16SL-CC04312 |
| Plaintiff/Petitioner: MERILYNN JORDAN vs. | Plaintiff's/Petitioner's Attorney/Address THOMAS PHILLIP GERMEROTH SUITE 215 7710 CARONDELET AVENUE CLAYTON, MO 63105 |
| Defendant/Respondent: WAL-MART STORES EAST I L.P. DBA: WAL-MART SUPERCENTER STORE #1188 | Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105 |
| Nature of Suit: CC Pers Injury-Other | (Date File Stamp) |

SHERIFF FEE PAID**Summons in Civil Case**

The State of Missouri to: WAL-MART STORES EAST I L.P.

Alias:
DBA: WAL-MART SUPERCENTER STORE #1188
 R/A: CT CORPORATION SYSTEM
 120 S CENTRAL AVE
 CLAYTON, MO 63105

**ST. LOUIS COUNTY**03-MAR-2017
Date
ClerkFurther Information:
JJ**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____
 (name) _____ (title).

 other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

(Seal)

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable
Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ _____ 10.00

Mileage \$ _____

Total \$ _____ (_____ miles @ \$.____ per mile)

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) **Mediation:** A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) **Early Neutral Evaluation (“ENE”):** A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) **Mini-Trial:** A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) **Summary Jury Trial:** A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 7900 Carondelet Avenue, 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

3B
4/2**FILED**

MAR 21 2017

JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY**SHERIFF FEE
PAID**

| | |
|---|---|
| Judge or Division: MAURA B MCSHANE | Case Number: 16SL-CC04312 |
| Plaintiff/Petitioner: MERILYNN JORDAN | Plaintiff's/Petitioner's Attorney/Address THOMAS PHILLIP GERMEROTH SUITE 215 7710 CARONDELET AVENUE CLAYTON, MO 63105 |
| Defendant/Respondent: WAL-MART STORES EAST I L.P. DBA: WAL-MART SUPERCENTER STORE #1188 | Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105 |
| Nature of Suit: CC Pers Injury-Other | |

(Date File Stamp)

Summons in Civil CaseThe State of Missouri to: **WAL-MART STORES EAST I L.P.**

Alias:
**DBA: WAL-MART SUPERCENTER STORE #1188
R/A: CT CORPORATION SYSTEM
120 S CENTRAL AVE
CLAYTON, MO 63105**

30
CTCOR

COURT SEAL OF**ST. LOUIS COUNTY****03-MAR-2017**
Date

Joan M. Gilmer
Clerk

Further Information:
JJ**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____.

(name) _____ (title).

other _____

Served at **CT CORP LCW - B. LOVE** (address)

in **St. Louis County** (County/City of St. Louis), MO, on **MAR 16 2017** (date) at **9 A.M.** (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

MAR 17 2017
RECEIVED
MAY 14 2017
12

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

3/14 RB

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN,)
Plaintiff,)
vs.) Cause No: 16SL-CC04312
WAL-MART STORES EAST I, L.P.,)
d/b/a WAL-MART SUPERCENTER)
STORE #1188,) Division No: 13
Defendant.)

ENTRY OF APPEARANCE

COMES NOW Edward W. Zeidler II, Brown and James, PC, and hereby enters his appearance for Defendant Wal-Mart Stores East, LP (improperly pleaded as Wal-Mart Stores East I, LP d/b/a Wal-Mart Supercenter Store #1188) in the above captioned matter.

Edward W. Zeidler II

John P. Rahoy #41896

Edward W. Zeidler II #56638

BROWN & JAMES, P.C.

Attorneys for Defendant Wal-Mart Stores East, LP
(improperly identified as Wal-Mart Stores East I, LP
d/b/a Wal-Mart Supercenter Store #1188)

800 Market Street, Suite 1100

St. Louis, Missouri 63101

(314) 421-3400

(314) 421-3128 (Fax)

jrahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: tpp@germerothlaw.com, Mr. Thomas P. Germeroth, The Germeroth Law Firm, Attorneys for Plaintiff, 7710 Carondelet, Suite 215, Clayton, MO 63105, this 17 day of MARCH, 2017. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

Edward W. Zeidler II

slg
1/5/17
13381044

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN,)
vs. Plaintiff,) Cause No: 16SL-CC04312
vs. WAL-MART STORES EAST I, L.P.,) Division No: 13
d/b/a WAL-MART SUPERCENTER)
STORE #1188,)
Defendant.)

**DEFENDANT WAL-MART STORES EAST, LP (IMPROPERLY PLEADED AS WAL-MART STORES EAST I, LP
D/B/A WAL-MART SUPERCENTER STORE #1188)'S ANSWER AND RESPONSE TO PLAINTIFF'S PETITION**

COMES NOW Defendant Wal-Mart Stores East, LP (improperly pleaded as Wal-Mart Stores East I, LP d/b/a Wal-Mart Supercenter Store #1188) ("Defendant") and, for its Answer and Response to Plaintiff's Petition, states as follows:

1. Defendant states that it operates a Wal-Mart Store located at 11900 St. Charles Rock Road in Bridgeton, Missouri, 63044. Defendant denies the remainder of the allegations contained in paragraph 1 of Plaintiff's Petition.
2. Defendant lacks sufficient information to admit or deny the allegations contained in paragraph 2 of Plaintiff's Petition and, therefore, denies same.
3. Defendant denies the allegations contained in paragraph 3 of Plaintiff's Petition.
4. Defendant denies the allegations contained in paragraph 4 of Plaintiff's Petition.
5. Defendant denies the allegations contained in paragraph 5 of Plaintiff's Petition.
6. Defendant denies the allegations contained in paragraph 6 of Plaintiff's Petition.
7. Defendant denies each and every allegation contained in Plaintiff's Petition not specifically admitted above.

AFFIRMATIVE DEFENSES

1. For further answer and defense, Defendant states that Plaintiff's Petition fails to state a cause of action upon which relief can be granted.
2. For further answer and defense, Defendant states that whatever injuries and damages Plaintiff may have sustained, if any, were the direct and proximate result of her own carelessness and negligence and/or comparative fault.
3. For further answer and defense, Defendant states that it intends to rely upon the provisions of §490.715 R.S.Mo. as amended by tort reform effective August 28, 2005 limiting the economic damages for medical expenses to the amounts actually paid to healthcare providers.
4. For further answer and defense, Defendant states that Plaintiff has failed to mitigate her damages.

WHEREFORE, Defendant Wal-Mart Stores East, L.P. (improperly pleaded as Wal-Mart Stores East I, LP d/b/a Wal-Mart Supercenter Store #1188), having fully answered and responded to Plaintiff's Petition, prays that this Court dismiss Plaintiff's claims against this Defendant with prejudice and award costs and expenses incurred herein and for such further relief as the Court deems just and proper.

Edward W. Zeidler II

John P. Rahoy #41896

Edward W. Zeidler II #56638

BROWN & JAMES, P.C.

Attorneys for Defendant Wal-Mart Stores East, LP
(improperly identified as Wal-Mart Stores East I, LP
d/b/a Wal-Mart Supercenter Store #1188)

800 Market Street, Suite 1100

St. Louis, Missouri 63101

(314) 421-3400

(314) 421-3128 (Fax)

jrahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: tpp@germerothlaw.com, Mr. Thomas P. Germeroth, The Germeroth Law Firm, Attorneys for Plaintiff, 7710 Carondelet, Suite 215, Clayton, MO 63105, this 17 day of MARCH, 2017. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

Edward W. Zerbe Jr.

EWZ/slg
1/5/17
13368224

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN,)
vs. Plaintiff,) Cause No: 16SL-CC04312
vs.) Division No: 13
WAL-MART STORES EAST I, L.P.,)
d/b/a WAL-MART SUPERCENTER)
STORE #1188,)
Defendant.)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Defendant Wal-Mart Stores East LP's First Interrogatories Directed to Plaintiff Merilynn Jordan and Defendant Wal-Mart Stores East, LP's First Request for Production of Documents Directed to Plaintiff Merilynn Jordan were sent electronically in MS Word format and via US Mail, postage prepaid, to: tpg@germerothlaw.com, Mr. Thomas P. Germeroth, The Germeroth Law Firm, Attorneys for Plaintiff, 7710 Carondelet, Suite 215, Clayton, MO 63105, this 17 day of MARCH, 2017

Edward W. Zeidler II
John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorneys for Defendant Wal-Mart Stores East, LP
(improperly identified as Wal-Mart Stores East I, LP
d/b/a Wal-Mart Supercenter Store #1188)
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: tpg@germerothlaw.com, Mr. Thomas P. Germeroth, The Germeroth Law Firm, Attorneys for Plaintiff, 7710 Carondelet, Suite 215, Clayton, MO 63105, this 17 day of MARCH, 2017. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

Edward W. Zandl II

slg
1/5/17
13381803

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN,

Plaintiff,

vs.

WAL-MART STORES EAST I, L.P.,
d/b/a WAL-MART SUPERCENTER
STORE #1188,

Defendant.

) Cause No: 16SL-CC04312

) Division No: 2

MOTION TO COMPEL

COMES NOW Defendant Wal-Mart Stores East, LP (improperly identified as Wal-Mart Stores East I, LP d/b/a Wal-Mart Supercenter Store #1188), by and through counsel, and for its Motion to Compel states as follows:

1. On or about March 17, 2017, Defendant propounded its First Interrogatories and First Request for Production to Plaintiff.
2. After thirty (30) days, no Answers or Responses were received.
3. On or about April 19, 2017, Defendant attempted in good faith to obtain Answers and Responses from Plaintiff.
4. To date, no such Answers to Responses have been received.

WHEREFORE, Defendant prays that this Court order Plaintiff to provide complete Answers and Responses to Defendant's First Interrogatories and First Request for Production within twenty (20) days and for any further relief this Court deems just.

Edward W. Zeidler

John P. Rahoy #41896

Edward W. Zeidler II #56638

BROWN & JAMES, P.C.

Attorneys for Defendant Wal-Mart Stores East, LP

(improperly identified as Wal-Mart Stores East I, LP

d/b/a Wal-Mart Supercenter Store #1188)

800 Market Street, Suite 1100

St. Louis, Missouri 63101

(314) 421-3400

(314) 421-3128 (Fax)

jrahoy@bjpc.com

ezeidler@bjpc.com

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: tpp@germerothlaw.com, Mr. Thomas P. Germeroth, The Germeroth Law Firm, Attorneys for Plaintiff, 7710 Carondelet, Suite 215, Clayton, MO 63105, this 19 day of April, 2017. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

Edward W. Zeidler

VAA/slg

4/19/17

13591130

In the

CIRCUIT COURT

of St. Louis County, Missouri



For File Stamp Only

7

Jordan, Marilyn

Plaintiff(s)

vs.

Wal-Mart Stores East

Defendant(s)

May 1 2017

Date

16SL A 04312

Case Number

2

Division

MAY - 1 2017

FILED
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

ORDER

Defendant's Motion to Compel Answers + Responses to its initial discovery called, heard, and granted by consent.

Plaintiff granted thirty days (30) to provide executed answers and responses.

SO ORDEREDMaura B. McShane

Judge

ENTERED: 5/1/17
(Date)V. Alvarez65744Attorney for A Bar No. 314 242 5347

Address

Phone No.

Fax No.

Attorney

Bar No.

Address

Phone No.

Fax No.

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN,)
)
Plaintiff,)
) Cause No: 16SL-CC04312
vs.)
) Division No: 13
WAL-MART STORES EAST I, L.P.,)
d/b/a WAL-MART SUPERCENTER)
STORE #1188,)
)
Defendant.)

CERTIFICATE OF SERVICE

COMES NOW Thomas P. Germeroth, attorney for Plaintiff and hereby certifies that Plaintiff's First Set of Interrogatories and Request for Production of Documents were served via email to Defendant's counsel John P. Rahoy , jrahoy@bjpc.com in accordance with Missouri Rules of Civil Procedure this 14th of June, 2017.

Respectfully submitted,

THE GERMEROTH LAW FIRM, LLC



Thomas P. Germeroth, #47611
7710 Carondelet Ave., Suite 215
Clayton, Missouri 63105
(314) 727-2100 Telephone
(314)727-2700
tpg@germerothlaw.com

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

MERILYNN JORDAN,)
Plaintiff,) Cause No: 16SL-CC04312
vs.) Division No: 2
WAL-MART STORES EAST I, L.P.,)
d/b/a WAL-MART SUPERCENTER)
STORE #1188,)
Defendant.)

NOTICE

Scott Noal Jordan
2316 Spencer Avenue
Overland, MO 63114

Your spouse, Merilynn Jordan, has filed the above-referenced cause of action alleging injuries as a result of the incident which allegedly occurred on or about February 16, 2016 at the Wal-Mart Supercenter located at 11900 St. Charles Rock Road, Bridgeton, Missouri 63044.

You are hereby notified that, under Rule 66.01 of the Missouri Rules of Civil Procedure, you must assert any claim for loss of consortium or services, or either, arising out of such alleged injuries by joining as a Plaintiff in the above-captioned action. If you fail to join as a Plaintiff in such action to assert such claim within 30 days of receipt of this notice, your claim, if any, will be forever barred.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
DELIVER TO ADDRESSEE ONLY

Edward W. Zeidler II
John P. Rahoy #41896
Edward W. Zeidler II #56638
BROWN & JAMES, P.C.
Attorneys for Defendant Wal-Mart Stores East, LP
(improperly identified as Wal-Mart Stores East I, LP
d/b/a Wal-Mart Supercenter Store #1188)
800 Market Street, Suite 1100
St. Louis, Missouri 63101
(314) 421-3400
(314) 421-3128 (Fax)
jrahoy@bjpc.com
ezeidler@bjpc.com

CC: Mr. Thomas P. Germeroth
The Germeroth Law Firm
Attorneys for Plaintiff

The undersigned hereby certifies that the above and foregoing pleading was filed electronically with the above-captioned Court, with notice of case activity to be generated and sent electronically by the Clerk of said Court to: tpg@germerothlaw.com, Mr. Thomas P. Germeroth, The Germeroth Law Firm, Attorneys for Plaintiff, 7710 Carondelet, Suite 215, Clayton, MO 63105, this 19 day of JUNE, 2017. Pursuant to Rule 55.03(a), the undersigned further certifies that he signed an original of this pleading and that an original of this pleading shall be maintained for a period not less than the maximum allowable time to complete the appellate process.

Edward W. Zandl II

EWZ/slg
6/19/17
13703159